

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI

BOBBY BANKS, et al.,

Plaintiffs,

v.

DIRECTV, INC., et al.,

Defendants.

Case No. 1:14-CV-00398-LG-RHW

APPLICATION FOR ADMISSION PRO HAC VICE

(A) Name: Todd C. Werts

Firm Name: Lear Werts LLP

Office Address: 2003 W. Broadway, Suite 107
Columbia, MO 65203

Telephone: 573-875-1991 Fax: 573-875-1985

E-mail: werts@learwerts.com

(B) Client(s): Bobby Banks
Address: 5007-A Ward Road
Port Gibson, MS 39150
Telephone: 601-618-8062 Fax: _____

Client(s): Zangerio Dogan
Address: 5678 Sycamore Ridge Road
Memphis, TN 38134
Telephone: 901-832-9495 Fax: _____

Client(s):	Timothy Dogan		
Address:	116 Fox Run Dirve		
	Jackson, MS 39212		
Telephone:	769-798-6592	Fax:	_____
Client(s):	William Frazier		
Address:	4335 Oak Spring Drive		
	Millinton, TN 38053		
Telephone:	901-859-6858	Fax:	_____
Client(s):	Eric Gomez		
Address:	420 Timber Way S.		
	Hernando, MS 38632		
Telephone:	901-569-0890	Fax:	_____
Client(s):	Richard Phillips		
Address:	1286 David Road		
	Coldwater, MS 38618		
Telephone:	901-490-8107	Fax:	_____
Client(s):	Aric Riley		
Address:	144-A McDonald Lane		
	Madison, MS 39110		
Telephone:	601-503-7255	Fax:	_____
Client(s):	Christopher Roberts		
Address:	45 J.L. Williams Road, Lot 23		
	Hattiesburg, MS 39401		
Telephone:	601-434-1139	Fax:	_____
Client(s):	Van Roden		
Address:	1030 35 th Street, A6		
	Gulf Port, MS 39574		
Telephone:	228-234-4746	Fax:	_____
Client(s):	Ricky Romines		
Address:	70 Fence Way Drive		
	Brandon, MS 39042		
Telephone:	601-502-5961	Fax:	_____
Client(s):	Larry Sanders		
Address:	117 Whispering Oaks Xing		
	Pearl, MS 39208		
Telephone:	601-383-6468	Fax:	_____

Client(s):	Emmanuel Stallworth		
Address:	3713 Roberts Road		
	Moss Point, MS 39562		
Telephone:	228-218-3992	Fax:	_____
Client(s):	Shun Thomas		
Address:	2814 Lecren Street		
	Mobile, AL 36607		
Telephone:	251-473-1124	Fax:	_____
Client(s):	Arthur Vardaman		
Address:	313 Timber Ridge Drive		
	Ridgeland, MS 39157		
Telephone:	601-853-9140	Fax:	_____
Client(s):	Sheldon Watts		
Address:	3332 Meridian Street N., Apt. D6		
	Huntsville, AL 35811		
Telephone:	256-655-0650	Fax:	_____
Client(s):	Marcus Simpson		
Address:	84C Azzie Lee Road		
	Courtland, MS 38620		
Telephone:	713-355-0424	Fax:	_____

Has Applicant had a prior or continuing representation in other matters of one or more of the clients Applicant proposes to represent and is there a relationship between those other matter(s) and the proceeding for which Applicant seeks admission?

As explained in the Complaint at paragraphs 74-78, Applicant has previously represented the above clients in their claims against DIRECTV and its related entities in *Arnold v. DIRECTV*, Case No. 10-0352, pending in the Eastern District of Missouri, *Acfalle v. DIRECTV*, 13-8108, formerly pending in the Central District of California, and *Lang v. DIRECTV*, Case No. 10-1085, formerly pending in the Eastern District of Louisiana.

Does Applicant have any special experience, expertise, or other factor that Applicant believes makes it particularly desirable that Applicant be permitted to represent the client(s) Applicant proposes to represent in this case?

Based on Applicant's prior representation in the above-referenced cases, Applicant has a certain amount of "institutional knowledge" about the claims at issue and the Defendants' employment practices challenged in this case.

(C) Applicant is admitted to practice in the:

X State of Missouri
 _____ District of Columbia

And is currently in good standing with that Court. A certificate to that effect, issued within ninety days of the date of this Application, is enclosed; the physical address, telephone number and website/email address for that admitting Court are:

Missouri Supreme Court
207 West High Street
Jefferson City, MO 65101
573-751-4144 (T)
<http://www.courts.mo.gov/page.jsp?id=27>

All other courts before which Applicant has been admitted to practice:

Jurisdiction	Period of Admission
<u>U.S. Dist. Ct. for the Western District of Missouri</u>	<u>9/2001-present</u>
<u>State of Kansas</u>	<u>2/2002-present</u>
<u>U.S. Dist. Ct. for the District of Kansas</u>	<u>2/2002-present</u>
<u>U.S. Dist. Ct. for the Eastern District of Missouri</u>	<u>10/2006-present</u>
<u>U.S. Dist. Ct. for the District of Colorado</u>	<u>2/2010-present</u>
<u>U.S. Dist. Ct. for the Northern District of Illinois</u>	<u>9/2012-present</u>
<u>U.S. Dist. Ct. for the Eastern District of Colorado</u>	<u>10/2014-present</u>

- | | Yes | No |
|---|------------|-----------|
| (D) Has Applicant been denied admission pro hac vice in this state? | | X |
| Has Applicant had admission pro hac vice revoked in this state? | | X |
| Has Applicant been formally disciplined or sanctioned by any court
In this state in the last five years? | | X |

If the answer was "yes," describe, as to each such proceeding, the nature of the allegations, the name of the person or authority bringing such proceedings; the dates the proceedings were initiated and finally concluded; the style of the proceedings; and the findings made and actions taken in connection with those proceedings:

N/A

- | | Yes | No |
|--|------------|-----------|
| (E) Has any formal, written disciplinary proceeding ever been brought against Applicant by a disciplinary authority in any other jurisdiction within the last five years? | | X |

If the answer was "yes," describe, as to each such proceeding, the nature of the allegations; the name of the person or authority bringing such proceedings; the date the proceedings were initiated and finally concluded; the style of the proceedings; and the findings made and actions taken in connection with those proceedings.

N/A

- | | Yes | No |
|--|------------|-----------|
| (F) Has Applicant been formally held in contempt or otherwise sanctioned by any court in a written order in the last five years for disobeying its rules or orders? | | X |

If the answer was "yes," describe, as to each such order, the nature of the allegations, the name of the court before which such proceedings were conducted; the date of the contempt order or sanction, the caption of the proceedings, and the substances of the court's ruling (a copy of the written order or transcript of the oral rulings must be attached to the application).

N/A

- (G)** Please identify each proceeding in which Applicant has filed an application to proceed pro hac vice in this state within the preceding two years, as follows:

Name and
Address of Court

Date of
Application

Outcome Of
Application

NONE

- (H)** Please identify each case in which Applicant has appeared as counsel pro hac vice in this state within the immediately preceding twelve months, ins presently appearing as counsel pro hac vice, or has pending application for admission to appear pro hac vice, as follows:

Name and
Address of Court

Style of Case

NONE

- (I)** Has Applicant read and become familiar with all the LOCAL UNIFORM CIVIL RULES OF THE UNITED STATES DISTRICT COURTS FOR THE NORTHERN AND SOUTHERN DISTRICTS OF MISSISSIPPI?

Yes No

X

Has Applicant read and become familiar with the MISSISSIPPI RULES OF PROFESSIONAL CONDUCT?

X

- (J) Please provide the following information about the resident attorney who has been associated for this case:

Name and Bar No: Cynthia D. Burney

Firm Name: _____

Office Address: P.O. Box 3387

City: Bay St. Louis State MS Zip 39521

Telephone: 228-467-5589 Fax: 228-586-6069

E-mail: cindyburney@bellsouth.net

- (K) The undersigned resident attorney certifies that he/she agrees to the association with Applicant in this matter and to the appearance as attorney of records with Applicant.

/S/ Cindy Burney

Resident Attorney

I certify that the information provided in this Application is true and correct.

1/20/2015
Date

Todd West
Applicant's Signature

Unless exempted by Local Rule 83.1(d)(5), the application fee established by this Court must be enclosed with this Application.

CERTIFICATE OF SERVICE

The undersigned Applicant certifies that a copy of this Application for Admission Pro Hac Vice has been mailed or otherwise served on this date on all parties who have appeared in this case.

This the 10th day of February, 2015.

/S/ Cindy Burney

Applicant